

All Cases: Debtor(s) Elisa Arellano Case No. 18-01539 Chapter 7

All Cases: Moving Creditor PROF-2013-S3 LEGAL TITLE TRUST II, BY
U.S. BANK NATIONAL ASSOCIATION, AS
LEGAL TITLE TRUSTEE Date Case Filed 1/18/18

Nature of Relief Sought: X Lift Stay Annul Stay Other (describe) _____

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed _____

Chapter 7: No-Asset Report filed on _____
X No-Asset Report not Filed, Date of Creditor's Meeting: 02/21/2018

1. Collateral

a. Home X
b. Car Year, Make and Model _____
c. Other _____

2. Balance Owed as of 01/26/2018: \$226,750.58

Total of all other Liens against Collateral: \$.00

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in *all* cases) \$230,000.00, per Debtor's Schedules.

5. Default

a. X Total Default as of 01/26/2018
Number of months 52 Amount \$82,847.80

b. Post-Petition Default

i. On direct payments to the moving creditor
Number of months _____ Amount _____

ii. On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount _____

6. Other Allegations

a. Lack of Adequate Protection § 362(d)(1)

i. No insurance
ii. Taxes unpaid Amount _____
iii. Rapidly depreciating asset
iv. Other (describe) _____

b. X No Equity and not Necessary for an Effective Reorganization § 362(d)(2)

c. Other "Cause" § 362(d)(1)
i. Bad faith (describe) _____
ii. Multiple filings _____
iii. Other (describe) _____

d. Debtor's Statement of Intention regarding the Collateral

i. Reaffirm ii. Redeem
iii. X Surrender iv. No Statement of Intention Filed

Date: 2/5/2018

/s/ Peter C. Bastianen
Counsel for Movant